

STIP

GABRIEL L. GRASSO, ESQ.
State Bar Number 7358
SMITH & GRASSO, LTD.
9525 Hillwood Drive, Suite 190
Las Vegas, Nevada 89134
(702) 868-8866
gabriel@grassodefense.com
Attorney for REESE

UNITED STATES DISTRICT COURT

IN AND FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DARYLL REESE,

Defendant.

Case No.: 2:13-cr-00083-JCM-CWH

STIPULATION TO CONTINUE
SENTENCING

(SECOND REQUEST)

Certification: This stipulation is filed pursuant to General Order 2007-04.

IT IS HEREBY STIPULATED AND AGREED, by and between the defendant, DARYLL REESE through his attorney of record GABRIEL L. GRASSO, ESQ., and the United States of America, through LISA CARTIER-GIROUX, Assistant United States Attorney, that the sentencing hearing currently scheduled for March 15, 2017, at 10:00 a.m., be vacated and continued to a date and time convenient to this court, but no event earlier than sixty (60) days.

This Stipulation is entered into pursuant to General Order 2007-04 and based upon the following:

1. REESE is currently set for sentencing on Wednesday, March 15, 2017.
2. The defense needs additional time to prepare a sentencing memorandum.

1 3. The parties agree to this continuance.

2 4. REESE is out of custody and does not object to this continuance.

3 5. Denial of this request for continuance would deny the defendant sufficient
4 time to be able to assist in his sentencing, taking into account the exercise
5 of due diligence.

6 6. This is the second request for a continuance of the sentencing date in this
7 case.

8
9 DATED this 3rd day of March, 2017.

10 RESPECTFULLY SUBMITTED BY:

11
12 /s/ Lisa Cartier-Giroux
13 Lisa Cartier-Giroux
14 Assistant United States Attorney

/s/ Gabriel L. Grasso
 Gabriel L. Grasso
 Attorney for Defendant

STIP

GABRIEL L. GRASSO, ESQ.
State Bar Number 7358
SMITH & GRASSO, LTD.
9525 Hillwood Drive, Suite 190
Las Vegas, Nevada 89134
(702) 868-8866
gabriel@grassodefense.com
Attorney for REESE

UNITED STATES DISTRICT COURT

IN AND FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DARYLL REESE,

Defendant.

Case No.: 2:13-cr-00083-JCM-CWH

STIPULATION TO CONTINUE
SENTENCING

(SECOND REQUEST)

Based upon the submitted Stipulation, and good cause appearing therefore, the Court finds that:

1. The defense requires a continuance in order to prepare for sentencing.
2. The defense requires a continuance of the sentencing date in order to complete the Sentencing Memorandum in this case.
3. This stipulation complies with General Order 2007-04.

CONCLUSIONS OF LAW

1. Denial of this request for continuance would deny REESE the opportunity to fully prepare for sentencing in this case.

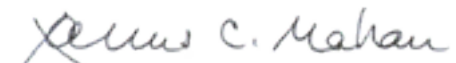
1 2. Additionally, denial of this request for continuance would result in a
2 miscarriage of justice.

3 3. For all of the above stated reasons, the ends of justice would best be served
4 by a continuance of the sentencing hearing date.

5
6 **ORDERED**

7 **IT IS ORDERED UNDER** that the sentencing hearing currently scheduled for
8 March 15, 2017, at 10:00 a.m., be vacated and continued to **May 18, 2017 at 10:00 a.m.**

9
10
11 IT IS SO ORDERED:

12
13 
14 UNITED STATES DISTRICT JUDGE

15
16 DATED: March 10, 2017
17 _____
18
19
20
21
22
23
24
25
26
27
28